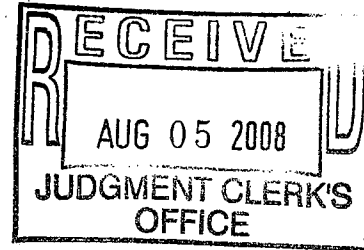


JUDGE SAND

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
EIM MANAGEMENT (USA) INC., :

Plaintiff, :

v. :

JOHN DOES 1-10, :

Defendants. :

----- x

08 CW 6980
Civil Action
No. _____

HEARING REQUESTED

**PLAINTIFF EIM MANAGEMENT (USA) INC.'S
EX PARTE MOTION FOR LIMITED EXPEDITED DISCOVERY**

EIM commenced this suit to bring to a pointed end a deliberate and ongoing financial fraud designed to take advantage of EIM's good name while shrouding the John Doe wrongdoers in a web of secrecy. Pursuant to Federal Rule of Civil Procedure 26(d), Plaintiff EIM Management (USA) Inc. ("EIM") hereby requests that the Court enter an Order allowing it to immediately take limited expedited discovery of non-parties that are in possession of information necessary to identify the John Doe Defendants who are perpetrating the unlawful activity at issue in this action. Without this required discovery, EIM will be significantly

hindered in its ability to effectively shut down the investment scam that risks tarnishing its good name and otherwise meaningfully prosecute the claims alleged in its Complaint.

The grounds for this motion are set forth in the accompanying memorandum of law.

WHEREFORE, EIM respectfully requests that the Court grant this motion and issue an Order granting EIM leave to immediately conduct limited expedited discovery. A form of proposed order is attached hereto as Exhibit A.

Dated: August 5, 2008
New York, New York

Respectfully submitted,



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EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
EIM MANAGEMENT (USA) INC., :
 :
 Plaintiff, : Civil Action
 : No. _____
 v. :
 :
 JOHN DOES 1-10, :
 :
 Defendants. :
----- X

**[PROPOSED] ORDER ON PLAINTIFF EIM MANAGEMENT
(USA) INC'S EX PARTE MOTION FOR LIMITED EXPEDITED DISCOVERY**

Upon consideration of EIM Management (USA) Inc.'s ("EIM") Ex Parte Motion
For Limited Expedited Discovery and all other papers and proceedings herein:

IT IS HEREBY ORDERED THAT:

1. EIM's motion is hereby granted in all respects;
2. EIM may serve third-party subpoenas on (i) AOL LLC, (ii) the California Public Utilities Commission, (iii) e-Bullion, (iv) e-gold, (v) eNom, Inc. and (vi) Yahoo! Inc. to ascertain information regarding the identities of the John Doe Defendants.

Dated: August __, 2008

SO ORDERED:

United States District Judge